

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
JASPER COUNTY) FOR THE FOURTEENTH JUDICIAL
) CIRCUIT
) CASE NO. 2018-CP-27-_____

BRANDY EDWARDS,)
)
 Plaintiff,)
)
 vs.)
)
 CAROLYN BAUMAN AND)
 TRUSTED SYSTEMS, INC,)
)
 Defendants.)

SUMMONS

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to this Complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to appear and defend this action by answering the Complaint, judgment by default will be rendered against you for the relief demanded in the Complaint.

Respectfully submitted,

By: s/J. Taylor Powell
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Attorneys for Plaintiff

April 10, 2018
Charleston, South Carolina

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
JASPER COUNTY)	FOR THE FOURTEENTH JUDICIAL CIRCUIT
)	
BRANDY NICOLE EDWARDS,)	Case No.: 2018-CP-27-_____
)	
Plaintiff,)	COMPLAINT
)	(Jury Trial Demanded)
vs.)	
)	(Personal Injury/Motor Vehicle Accident)
CAROLYN BAUMAN AND)	
TRUSTED SYSTEMS, INC,)	
)	
Defendants.)	

COMES NOW THE PLAINTIFF, Brandy Nicole Edwards, complaining of the above-named Defendants, and alleges as follows:

PARTIES

1. The Plaintiff is a citizen and resident of Charleston County in the State of South Carolina.
2. Upon information and belief, Defendant Carolyn Bauman, is a citizen and resident of Anne Arundel County in the State of Maryland. Upon information and belief Defendant Bauman is or was an agent of Defendant Trusted Systems, Inc. at the period relevant to this Complaint.
3. Upon information and belief, Defendant Trusted Systems, Inc. is a business incorporated in Arizona with a principal place of business in Carroll County in the State of Maryland. Upon information and belief Defendant Trusted Systems, Inc. is or was the owner of the vehicle that Defendant Bauman was driving at the time of the motor vehicle accident which is the subject of this lawsuit.

JURISDICTION AND VENUE

4. The motor vehicle accident that caused Plaintiff's injuries occurred on July 29, 2017 in Jasper County, South Carolina.

5. That this Court has jurisdiction pursuant to S.C. Code Ann. §15-7-30 as the motor vehicle accident, which is the subject of this action, occurred in Jasper County in the State of South Carolina and venue is proper in Jasper County.

STATEMENT OF FACTS

6. That on July 29, 2017, at approximately 3:00 p.m., Plaintiff was driving a 2011 BMW 2S bearing license plate number PLS1420, heading south on U.S. Highway 17.

7. On July 29, 2017, Defendant Bauman was driving a 2006 Volvo bearing license plate number 38601CC, and was attempting to exit a gas station and turn left onto U.S. Highway 17 in Hardeeville, South Carolina.

8. At the times mentioned in this Complaint, Defendant Trusted Systems, Inc., was the owner of the 2006 Volvo bearing license plate number 38601CC being operated by Defendant Bauman.

9. On July 29, 2017, Defendant Bauman was the agent, servant, and/or employee of Defendant Trusted Systems, Inc.

10. Defendant Bauman failed to yield the right of way to Plaintiff. Plaintiff attempted to stop, swerve, and avoid Defendant's vehicle, but was unable to avoid contact, causing the front of Plaintiff's vehicle to collide with the driver's side of Defendant's vehicle.

FOR A FIRST CAUSE OF ACTION
(Negligence)

11. Plaintiff realleges and reincorporates the above paragraphs as if fully set forth herein verbatim.

12. Defendant Trusted Systems, Inc., by and through its agent, Defendant Bauman at all times pertinent hereto had a duty to the general public, including Plaintiff, to operate the vehicle owned by Defendant Trusted Systems, Inc. in a safe manner and in compliance with the statutory and common laws of the State of South Carolina.

13. Defendant Trusted Systems, Inc., by and through its agent, Defendant Bauman breached the duty owed to the Plaintiff by carelessly, negligently, and willfully operating a motor vehicle on a public roadway in a negligent and reckless manner.

14. Defendant Trusted Systems, Inc., by and through its agent, Defendant Bauman, by her acts and omissions, was negligent, negligent *per se*, grossly negligent, careless, willful, and wanton in one or more of the following particulars:

- a). In failing and neglecting to maintain a proper and careful lookout;
- b). In failing and neglecting to keep her vehicle under proper control, or to so control the same as to avoid the collision;
- c). In failing to yield the right-of-way to approaching vehicles when entering the roadway;
- d). In failing to avoid a collision with Plaintiff's vehicle;
- e). In failing to exercise the degree of care and caution that a reasonable and prudent person would use under similar circumstances; and
- f). In acting with a reckless disregard for the rights and safety of others, especially the rights and safety of the Plaintiff.

All of which are in violation of the statutes, regulations, rules and laws of South Carolina.

15. That as a direct and proximate result of the negligence, negligence *per se*, gross negligence, carelessness, recklessness, willfulness, and wantonness of Defendant Trusted

Systems, Inc., by and through its agent, Defendant Bauman, Plaintiff has suffered in the past, and will, upon information and belief, continue to suffer great physical harm and permanent injuries, as well as the following particulars:

- a). Pain and suffering;
- b). Past and future medical expenses;
- c). Past and future lost wages;
- d). Injuries to her person;
- e). Mental anguish, worry, and stress;
- f). Miscellaneous expenses and costs; and
- g). In such other and further ways as the evidence will show at trial.

WHEREOFRE, Plaintiff demands judgment against Defendants for actual damages, including damages for past and future medical expenses and past and future physical and mental pain and suffering, together with the costs and disbursements of this action, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

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